

DECLARACIÓN JURADO DE JOSÉ DE LA CRUZ

Yo, José de la Cruz, digo y declaro lo siguiente:

1. Mi nombre es José de la Cruz. Yo nací en Boba, en la Republica Dominicana el [REDACTED]. Tengo cincuenta y tres anos de edad.
2. Obel Cruz García es mi sobrino. Su padre, Valerio De La Cruz Santos, es mi hermano. Nosotros tenemos una familia bien grande. Nuestro padre tuvo muchas relaciones románticas con diferentes mujeres y tiene muchos hijos. Yo creo que tengo veinte y dos hermanos y hermanas al resultado de las muchas relaciones que tuvo mi padre, el abuelo de Obel. Yo mismo tengo ocho hijos con cuatro diferentes mujeres. En nuestra familia, los hombres tienen familias grandes.
3. Yo vivo en San Juan, Puerto Rico, donde trabajo labor manual. Yo trabajo de jardinero y también arreglo techos de casas para gente, pinto casas de gente, y mantengo los jardines de gente. Me gusta trabajar duro y tengo buena salud.
4. Yo recuerdo Obel muy claramente de cuando era niño. En ese tiempo yo todavía vivía junto con mis padres (los abuelos de Obel) en la Republica Dominicana en Boba. Valerio mudo allí con Obel y con su otro hijo Joel. Otros de los tíos y tías de Obel también vivieron juntos con nosotros en el pueblo. Esto era después de que el padre y madre de Obel se separaron. Yo pensaba que eran una familia feliz. Yo no se porque se separaron los padres de Obel, pero yo creo que una de las causas de la separación fue que mi hermano se metió en el ejercito y

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- tenia que viajar mucho para el trabajo. Por de mas, mi hermano se fue a estudiar medicina, y yo creo que todo el tiempo que mantenía mi hermano separado de su familia causo estrés para todos en la familia.
5. La agricultura era el negocio de nuestro familia. Nuestra familia aprendió a vivir de la tierra. Pudimos vivir de la tierra porque mis padres eran dueños de una grande porción de tierra. Nosotros sembramos y cosechábamos para comer y para vender. Nosotros también pescábamos. Nosotros pescábamos por muchos diferentes tipos de peces. Vendíamos lo que no queríamos y atreves de estos negocios, ganábamos bien dinero. Nosotros fuimos bendecidos con nuestros finanzas y si queríamos pudríamos sacar una presta de dinero del banco.
 6. Yo creo que yo era el tío favorito de Obel. Dondequiera que yo iba, Obel me seguía. Abecés, recogíamos mangos juntos o trabajábamos juntos en los campos de arroz. Cada vez que yo me volteaba, allí estaba Obel trabajando conmigo. Obel era un niño trabajador pero también era relajado. El hacia sus tareas y era responsable.
 7. En nuestra familia, Obel tenia la reputación de ser una persona que estaba dispuesta a ayudar a cualquier que necesitaba ayuda. Este es el Obel que yo conocí. La familia nos juntábamos y compartíamos historias. Algunas de las historias se trataban de Obel. Por ejemplo, Obel pescaba con su padre. Abecés Obel y su padre se metían en problemas en el barca que tenían para pescar. El padre de Obel nos conto de una ocasión cuando el y Obel estaban pescando y el barco volcó. El padre de Obel se cayó en la agua. En vez de estar asustado, Obel inmediatamente se metió en la agua para rescatar a su padre.

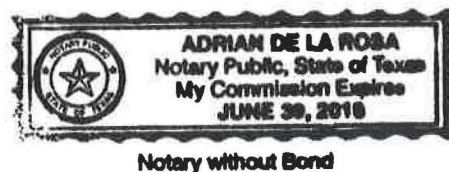
8. En otra ocasión, el padre de Obel se cayó en la agua después de que se entrapo en la red de pescar. Y Obel lo rescato otra vez. Todo la familia sabíamos de estas historias de Obel y estábamos muy orgullosos de él.
9. Yo recuerdo que Joel y Obel fueron a la escuela cuando vivían en Boba. Ellos siguieron haciendo sus tareas en la casa y Obel era un buen trabajador.
10. Yo estaba bien sorprendido y molesto después de aprender del caso de Obel en Houston y después de aprender de su situación. Nadie de su equipo de defensa me contactaron antes del juicio de Obel. Si alguien me hubiera contactado, yo les hubiera dicho del Obel que yo conocí, el niño que siempre quería estar pescando o jugando en los campos de arroz. Si me hubieron preguntado a testificar, yo les diría de las veces que Obel salvo la vida de su papa, aun cuando era niño.
11. Yo he leído y revisado esta declaración jurada de 3 páginas.

Yo declare bajo pena de perjurio y bajo las leyes del estado de Texas, que lo anterior es verdadero y correcto según mi mejor conocimiento y que este declaración jurado fue ejecutado el 13 de Marzo, 2015 en San Juan, Puerto Rico

Jose de la Cruz
Jose de la Cruz

Subscribed and sworn to before me on March 13, 2015.

[Signature]
Notary Public, State of Texas



CERTIFICATION OF SARAH VALENZUELA

I, Sarah Valenzuela, state and declare as follows:

1. My name is Sarah Valenzuela. I currently live in Austin, Texas. I am fluent in both English and Spanish.
2. I am a native Spanish speaker, born in El Paso, Texas. Spanish was my first language, and I speak Spanish regularly with several family members. I also took formal Spanish classes for native speakers during high school. I am able to speak, read, and write in Spanish proficiently.
3. I am currently a third-year law student at the University of Texas School of Law. I expect to receive my Juris Doctor (J.D.) degree in May of 2015. In September of 2015, I will begin a one-year clerkship with the Honorable Philip R. Martinez, a federal district judge in El Paso, Texas.
4. In January of 2015, I began a law-student clerkship with the Office of Capital Writs ("OCW"). In March 2015, I was asked by the OCW to translate several English-language affidavits into Spanish.
5. The attached notarized affidavit signed by *José de la Cruz* is the Spanish-language affidavit I translated from an English-language affidavit provided to me by the OCW. The English-language version of the affidavit is also here attached.

6. I declare under penalty of perjury under the laws of the State of Texas that the signed document is a true and correct translation of the English-language text that I originally received.

Executed on 4/28/15

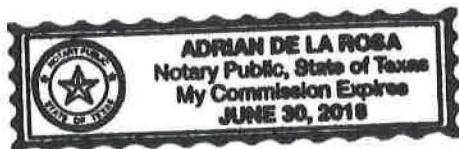
Sarah Valenzuela

Sarah Valenzuela

Subscribed and sworn to before me on April 28, 2015

[Signature]

Notary Public, State of Texas



Notary without Bond

AFFIDAVIT OF JOSÉ DE LA CRUZ

I, José de la Cruz, declare and state as follows:

1. My name is Jose de la Cruz. I was born in Boba, in the Dominican Republic, on August 29, 1961. I am currently fifty-three years old.
2. Obel Cruz Garcia is my nephew. His father, Valerio De La Cruz Santos, is my brother. We come from a very large family. Our father had many romantic partners and had many other children. I think I have about twenty-two brothers and sisters as a result of my father's—Obel's grandfather's—several relationships. I, myself, have eight children with four different women. In our family, the men all tend to have large families.
3. I currently live in San Juan, Puerto Rico, where I work manual labor. I work as a gardener and I also work fixing people's roofs, painting their houses, and taking care of their gardens. I like working hard and I am in good health.
4. I remember Obel very well from when he was a child. I was living in the Dominican Republic back then, with my parents (Obel's grandparents) in Boba. Valerio moved there with Obel and his other son Joel. There were several other of Obel's uncles and aunts that lived with us in the village too. This was after Valerio and Obel's mother separated. From what I knew of their family life, they were a happy family. I do not know why Obel's parents separated, but I think it had to do with my brother being in the military and traveling a lot for work. Also, my brother went off to study medicine, and I think all of that time away was stressful on their family.
5. Agriculture was our family business. Our family farmed and lived off the land. My parents owned a good amount of land that we could all live off of.

We would gather and grow food to eat and to sell. We also fished. We would fish for all sorts of different fish. We would sell what we did not want and we would make a good amount of money. We did well enough financially and could get loans from the bank if we needed. We were fortunate.

6. I think I was Obel's favorite uncle. Anywhere I would go, Obel would follow. Sometimes we would pick mangos together, or work in the rice fields. Any time I would turn around, there was Obel, working with me. Obel was a very hardworking, but laid back kid. He would do his chores and was responsible.
7. In our family, Obel had the reputation of being the person who would help you if you needed help. This was the Obel I knew. The family would have family stories that we would sit around and share with each other, and some were about Obel. For example, Obel would often go out fishing with his father. Sometimes Obel and his father would get into trouble on the fishing boat. One time Valerio and Obel were out fishing, and the boat capsized. Obel's father fell into the water. Instead of being scared, Obel immediately jumped into the water and rescued his father.
8. On another trip, Obel's father accidentally fell into the water after getting caught in the fishing netting. Again, Obel rescued his father. All of the family knew these stories about Obel and were very proud of him.
9. I remember both Joel and Obel went to school when we were in Boba. They continued to do their chores at the house and Obel was a very good worker.
10. I was very surprised and upset to hear about Obel's case in Houston and to learn of his current situation. No one from his defense team contacted me before the case went to trial. If someone had contacted me, I would have told them about the Obel that I knew, the child who always wanted to be

fishing or playing in the rice fields. If I had been asked to testify, I would have told the jury about the times that Obel saved his father's life, even though Obel was only a boy.

11.I have read and reviewed this _____ page affidavit.

I declare under penalty of perjury under the laws of the State of Texas that the foregoing is true and correct to the best of my knowledge and that this affidavit was executed on _____ of March, 2015, in _____.

Jose de la Cruz

Subscribed and sworn to before me on March __, 2015.

Notary Public, State of Texas